

MOTION FOR APPOINTMENT OF COUNSEL - CLASS-ACTION

JULIO A. ZUNIGA

3:22-cv-00052

United States Courts
Southern District of Texas
FILED

v.

PATRICK O'DANIEL

MAR 21 2022

Nathan Ochsner, Clerk of Court

PURSUANT TO 28 U.S.C. § 1915(e)(1) PLAINTIFFS IN CAUSE NO.

(3:22-cv-00052) MOVES FOR AN ORDER APPOINTING COUNSEL TO REPRESENT THEM IN THIS CASE. IN SUPPORT OF THIS MOTION, PLAINTIFF(S) STATES:

1: PLAINTIFF IS UNABLE TO AFFORD COUNSEL. HE HAS REQUESTED LEAVE TO PROCEED IN FORMA PROPRIIS.

2: PLAINTIFF(S) IMPRISONMENT WILL GREATLY LIMIT HIS ABILITY TO LITIGATE.

THE ISSUES INVOLVED IN THIS CASE ARE COMPLEX AND WILL REQUIRE SIGNIFICANT RESEARCH AND INVESTIGATION. PLAINTIFF HAS LIMITED ACCESS TO THE LAW LIBRARY AND LIMITED KNOWLEDGE OF THE LAW.

3: A TRIAL IN THIS CASE WILL LIKELY INVOLVE CONFLICTING TESTIMONY, AND COUNSEL WOULD BETTER ENABLE PLAINTIFFS TO PRESENT EVIDENCE AND CROSS EXAMINE WITNESSES.

4: THIS IS MY FIRST OFFICIAL EFFORT TO OBTAIN A LAWYER. TEXAS BOARD OF CRIMINAL JUSTICE / TEXAS DEPARTMENT OF CRIMINAL JUSTICE, ARE ACTIVELY INTENTIONALLY OPPRESSING, SUPPRESSING, COVERING UP MULTIPLE ACTS OF CORRUPTION, THAT INVOLVE BRAZORIA COUNTY - DISTRICT ATTORNEY; TBCJ HAS REDACTED THE STATE COUNSEL FOR OFFENDERS HANDBOOK - ON HABEAS CORPUS RELIEF, TO DEBILITATE INMATES AND KEEP US FROM FILING "PROSECUTORIAL MISCONDUCT".

THIS GROUNDS WAS INTENTIONALLY REMOVED, SPECIFICALLY BECAUSE OF "WHISTLE BLOWING" ON TDCJ - CORRUPTION WITH LOCAL GOVERNMENT. THIS IS AN ONGOING AFFAIR, AND IT'S INVOLVING TOP MEMBERS OF TBCJ / TDCJ. INMATE: STEPHEN CURTIS - IWW - IWC MEMBER IS NOW DECEASED BY POISONING

3/17/22 Julio A. Zuniga #196155 / IWW - IWC DELEGATE #X386969
MEMORIAL UNIT

59 DERRINGTON RD.

ROSHARON, TEXAS 77583